



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

January 13, 2005

**Certified Mail No. 7099 3220 0009 1975 3642**

Jeff Abbott  
Bennett Lumber Products, Inc.  
P.O. Box 49  
Princeton, ID 83857-0049

RE: Facility ID No. 057-00008, Bennett Lumber Products, Inc., Princeton  
Final Tier II Operating Permit

Dear Mr. Abbott:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2-010208 for the Bennett Lumber Products Inc. facility located in Princeton, in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

A representative of the Lewiston Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/DH/sd

Permit No. T2-010208

Enclosure



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** T2-010208

**FACILITY ID NO.:** 057-00008

**AQCR:** 62 **CLASS:** A

**SIC:** 2421 **ZONE:** 11

**UTM COORDINATE (km):** 517.4, 5195.7

1. **PERMITTEE**  
Bennett Lumber Products, Inc.

2. **PROJECT**  
Tier II Operating Permit

3. **MAILING ADDRESS**  
P.O. Box 49

**CITY**  
Princeton

**STATE**  
ID

**ZIP**  
83857

4. **FACILITY CONTACT**  
Jeff Abbott

**TITLE**  
Plant Engineer

**TELEPHONE**  
208-875-1121

5. **RESPONSIBLE OFFICIAL**  
Frank R. Bennett

**TITLE**  
Plant Manager

**TELEPHONE**  
208-875-1121

6. **EXACT PLANT LOCATION**  
Three miles east of Princeton on Highway 6

**COUNTY**  
Latah

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Lumber, wood chips, hog-fuel, and wood shavings

8. **PERMIT AUTHORITY**

This permit to construct and Tier II operating permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to the Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment, and will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** January 13, 2005

**DATE EXPIRES:** January 10, 2010

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## **Acronyms, Units, and Chemical Nomenclature**

AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMbf	million board feet
NO <sub>x</sub>	nitrogen oxides
O&M	operations and maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
T/yr	tons per year
VOC	volatile organic compound

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-010208****Permittee:** Bennett Lumber Products, Inc.  
**Location:** Princeton**Facility ID No.**  
057-00008**Date Issued:** January 13, 2005  
**Date Expires:** January 10, 2010**1. PERMIT SCOPE*****Purpose***

- 1.1 The purpose of this Tier II operating permit and permit to construct is to fulfill the requirements established in the compliance schedule contained in the facility's Tier I operating permit issued on May 15, 2001.
- 1.2 This Tier II operating permit and permit to construct (PTC) modifies the permit to construct issued June 1, 1977 to Bennett Lumber. The terms and conditions of which apply up to the date of issuance of this permit.

***Regulated Sources***

Table 1.1 below lists all sources of emissions regulated in this Tier II operating permit.

**Table 1.1: EMISSIONS SOURCES**

<b>Section</b>	<b>Equipment</b>	<b>Control</b>
3	Zurn Industries, Erie City hog-fuel boiler	Multiclone, Wet Scrubber
4	Drying Kilns	None
5	Woodworking Equipment	Cyclones, Baghouse

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**2. FACILITY-WIDE CONDITIONS*****Monitoring and Recordkeeping***

- 2.1 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least two years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

***Reports and Certifications***

- 2.2 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 "F" Street  
Lewiston, ID 83501  
Phone: (208) 799-4370 Fax: (208) 799-3451

***Obligation to Comply***

- 2.3 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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**3. ZURN INDUSTRIES, ERIE CITY HOG-FUEL BOILER**

Table 3.1 below describes the devices used in controlling emissions from the sources regulated in this permit.

**Table 3.1 CONTROL DEVICES**

Emissions Unit(s)/ Process(es)	Emission Control Device
Hog-fuel boiler	Multiclone in series with a wet scrubber

**Emission Limits**

- 3.1 Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) shall not exceed the corresponding limits below in Table 3.2.

**Table 3.2 HOG-FUEL BOILER HOURLY AND ANNUAL EMISSIONS LIMITS**

Emission Limits <sup>a</sup> - Hourly (lb/hr), and Annual <sup>b</sup> (T/yr)						
Source Description	Hourly PM <sub>10</sub> Emissions (lb/hr)	Annual PM <sub>10</sub> Emissions (T/yr)	NO <sub>x</sub>		CO	
			lb/hr	T/yr	lb/hr	T/yr
Zurn Industries, Erie City hog-fuel boiler	13.7	58.5	11.8	50.4	32.1	137.4

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[PTC Condition]

**Operating Requirements**

- 3.2 The permittee shall install, operate, calibrate, and maintain a device to continuously measure the scrubbing media flow rate.

[PTC Condition]

- 3.3 Within 60 days of permit issuance the permittee shall develop and follow an operations and maintenance (O&M) manual that contains the normal operating ranges for scrubbing media flow rates. In lieu of developing a new O&M manual for the equipment, the permittee may incorporate this information into the facility's existing O&M manual required by the Tier I operating permit. The permittee shall submit the O&M manual to DEQ within 30 days of its development in accordance with Permit Condition 2.2.

**Monitoring and Recordkeeping Requirements**

- 3.4 The permittee shall monitor and record the scrubber flow rate once daily.

[PTC Condition]

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#### 4. DRYING KILNS

Emissions Unit Group 2 consists of six drying kilns.

Table 4.1 below describes the devices used in controlling emissions from the sources regulated in this permit.

**Table 4.1 CONTROL DEVICES**

Emission Unit Identification	Emissions Unit(s)/Process(es)	Emission Control Device
P15, P16, P17, P18, P19, P20	Drying kiln Nos. 1, 2, 3, 4, 5, and 6	None

#### **Emission Limits**

- 4.1 Emissions of PM<sub>10</sub> and volatile organic compound (VOC) shall not exceed the corresponding limits listed in Table 4.1.

**Table 4.1 DRYING KILN EMISSIONS LIMITATIONS**

Emission Limits* - Annual(T/yr)		
Source Description	Annual PM <sub>10</sub> Emissions (T/yr)	Annual VOC Emissions (T/yr)
Drying kilns	9.2	72.9

\* As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[PTC Condition]

#### **Operating Requirements**

- 4.2 Lumber throughput of the drying kilns shall not exceed 97.2 million board feet (MMbf) per any consecutive 12-month period.

[PTC Condition]



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## 5. WOODWORKING EQUIPMENT

The emissions from the woodworking equipment are controlled by several cyclones and a baghouse.

Table 5.1 below describes the devices used in controlling emissions from the sources regulated in this permit section.

**Table 5.1 CONTROL DEVICES**

<b>Emission Point Identification</b>	<b>Emission Control Device</b>
P7	Sawdust cyclone
P11	Shavings cyclone
P12	Shavings cyclone
P13	Shavings cyclone
P14	Shavings cyclone
P21	Sawdust cyclone

### **Emissions Limits**

5.1 Emissions of PM<sub>10</sub> shall not exceed the corresponding limits listed in Table 5.3 below.

**Table 5.3 EMISSION SOURCE LIMITS**

<b>Emission Limits<sup>a</sup> - Hourly (lb/hr), and Annual<sup>b</sup> (T/yr)</b>		
<b>Exhaust Points</b>	<b>Hourly PM<sub>10</sub> Emissions (lb/hr)</b>	<b>Annual PM<sub>10</sub> Emissions (T/yr)</b>
Sawdust cyclone: P7	0.79	1.51
Shavings cyclone: P11	0.15	0.04
Shavings cyclone: P12	1.14	1.96
Shavings cyclone: P13	1.16	2.00
Shavings cyclone: P14	1.16	2.00
Sawdust cyclone: P21	0.79	1.51

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

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**6. APPENDIX**

**Table 7.1 EMISSION SOURCE LIMITS**

<b>Emission Limits<sup>a</sup> - Hourly (lb/hr), and Annual<sup>b</sup> (T/yr)</b>								
<b>Source Description</b>	<b>Hourly PM<sub>10</sub> Emissions (lb/hr)</b>	<b>Annual PM<sub>10</sub> Emissions (T/yr)</b>	<b>NO<sub>x</sub></b>		<b>CO</b>		<b>VOC</b>	
			<b>lb/hr</b>	<b>T/yr</b>	<b>lb/hr</b>	<b>T/yr</b>	<b>lb/hr</b>	<b>T/yr</b>
Zurn Industries, Erie City hog-fuel boiler	13.7	58.5	11.8	50.4	32.1	137.4		8.70
Drying kilns		9.2						72.9
Sawdust cyclone: P7	0.79	1.51						
Shavings cyclone: P11	0.15	0.04						
Shavings cyclone: P12	1.14	1.96						
Shavings cyclone: P13	1.16	2.00						
Shavings cyclone: P14	1.16	2.00						
Sawdust cyclone: P21	0.79	1.51						

<sup>a</sup> As determined by a pollutant-specific U.S. EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

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**7. GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of DEQ.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.